

# **Exhibit 1**



1           1.       “Bilateral Meeting” shall have the meaning as used in the Plaintiffs’ Fourth  
2 Amended Complaint.

3           2.       “Communication” means without limitation, oral or written communications of  
4 any kind, such as electronic communications, e-mails, facsimiles, telephone communications,  
5 correspondence, exchange of written or recorded information, or face-to-face meetings. The  
6 phrase “communication between” is defined to include instances where one party addresses the  
7 other party but the other party does not necessarily respond.

8           3.       “CRT” means cathode ray tube(s) and “CRT Products” means products containing  
9 cathode ray tubes.

10          4.       “CRT Conspiracy” means the conspiracy to violate antitrust laws as pled in the  
11 Plaintiffs’ Fourth Amended Complaint.

12          5.       “Defendant” refers to any defendant referred to in the current operative complaint  
13 filed by the Indirect Purchaser Plaintiffs, including defendant’s predecessors, successors,  
14 subsidiaries, departments, divisions and/or affiliates, including without limitation any  
15 organization or entity that the defendant manages or controls, together with all present and  
16 former directors, officers, employees, agents, representatives, or any persons acting or purporting  
17 to act on behalf of the defendant, regardless of whether any such predecessor, successor,  
18 subsidiary, division, affiliate, or present and former directors, officers, employees, agents,  
19 representatives, or any persons acting or purporting to act on your behalf is or is not a party to  
20 this litigation.

21          6.       “Document” means all documents and electronically stored information as defined  
22 in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document  
23 within the meaning of this term.

24          7.       “Employee” means any individual currently employed by, or at any time  
25 employed by, or acting as the agent of a Defendant as defined herein.

26          8.       “Evidence” means Documents, witness statements or testimony, and discovery  
27 responses.

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9. “Glass Meeting” shall have the meaning as set forth in the Plaintiffs’ Fourth Amended Complaint.

10. “Law Enforcement Agents” means agents of the United States Department of Justice, the Federal Trade Commission or any state attorneys general office who have authority to enforce state or federal antitrust or consumer protection laws in the United States.

11. “Meeting” means, without limitation, any assembly, convocation, encounter, or contemporaneous presence of two or more persons for any purpose, whether planned or arranged, scheduled or not.

12. “Person” or “Persons” is defined to mean any natural person, corporation, or partnership, proprietorship, joint venture, or any business, legal, or government entity, organization, or association.

13. “Class Period” means the period from March 1, 1995 through November 24, 2007.

14. “You” or “Your” means the responding Defendant, its predecessors, successors, subsidiaries, departments, divisions and/or affiliates, including without limitation any organization or entity which the responding Defendant manages or controls, together with all present and former directors, officers, employees, agents, representatives, or any persons acting or purporting to act on behalf of the responding Defendant, regardless of whether any such predecessor, successor, subsidiary, division, affiliate, or present and former directors, officers, employees, agents, representatives or any persons acting or purporting to act on your behalf is or is not a party to this litigation.

### **INSTRUCTIONS**

1. The obligation to answer these interrogatories is continuing pursuant to Rule 26(e) of the Federal Rules of Civil Procedure. If at any time after answering these interrogatories You discover additional information that will make your answers to these interrogatories more complete or correct, amend your answers as soon as reasonably possible.

2. When asked to identify a natural person, state the person’s name, employer, position dates of employment/tenure, and address for all times during the Class Period, as well as

1 their current or last known home address and telephone number. If any of such information  
2 changed during the Class Period, specify the time period to which the information provided in  
3 your answers pertains.

4 3. When asked to identify any entity other than a natural person, state the name and  
5 address of the principal office or headquarters. If any information changed during the Class  
6 Period, specify the time period to which the information provided in your answer pertains.

7 4. When asked to identify a CRT or CRT Product, state the manufacturer, product  
8 type (e.g. television or computer monitor), serial number, model number, and size.

9 5. When asked to identify an event, such as a communication, discussion, meeting,  
10 decision, or agreement, state the date, time, and address of the event, all of the participants in the  
11 event, and any formal or informal title by which the participants referred to the event.

12 6. If the responding party elects to produce business records in response to an  
13 interrogatory pursuant to Federal Rule of Civil Procedure 33(d), the responding party shall  
14 produce the records as they are kept in the usual course of business or shall organize and label  
15 them to correspond to the interrogatory. If the document is being produced in its native  
16 electronic format (allowing the document to retain its metadata), identify the document using its  
17 hash or other appropriate electronic identification and identify to the interrogatories to which the  
18 document is responsive. If the document is not being produced in electronic form, identify the  
19 document using the applicable bates numbers or specifically identify the type of document being  
20 produced (e.g., letter, memorandum, telegram, contract, invoice, etc.), its dates and author(s), its  
21 custodian, and every person to whom such a document or any copy thereof was given or sent.  
22 For all documents produced pursuant to Rule 33(d), identify the name of the employee, officer,  
23 or agent certifying the documents as business records.

24 **INTERROGATORIES**

25 **INTERROGATORY NO. 1:**

26 Have You ever participated in any conspiracy to fix prices, limit production or capacity,  
27 allocate customers and/or allocate market share of CRTs?

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1 **INTERROGATORY NO. 2:**

2 If You contend that You withdrew from any CRT Conspiracy, state:

3 (a) Why You withdrew from the conspiracy;

4 (b) What specific acts You took to withdraw from the CRT Conspiracy;

5 (c) Any co-conspirators or Law Enforcement Agents to whom You communicated  
6 Your withdrawal; and

7 (d) Who withdrew from the CRT Conspiracy on your behalf;

8 **INTERROGATORY NO. 3:**

9 If Your answer to Interrogatory No. 2, above, is in the affirmative, identify all Evidence  
10 upon which You intend to rely to prove such contention.

11 **INTERROGATORY NO. 5:**

12 Indicate whether You were notified at any time by any co-conspirator of any co-  
13 conspirator's intent to withdraw from the CRT Conspiracy?

14 **INTERROGATORY NO. 6:**

15 If Your answer to Interrogatory No.5 above, is in the affirmative, describe all  
16 communication(s) between You and any person(s) regarding any co-conspirator's intent to  
17 withdraw from the conspiracy, and identify all Evidence regarding such communications.

18 **INTERROGATORY NO. 7:**

19 For each affirmative defense in your Answer, identify all Evidence supporting that  
20 defense, or state that the defense will no longer be asserted.

21 **INTERROGATORY NO. 8:**

22 For each year during the Class Period, state by year how many CRTs (in both number of  
23 units and revenue in U.S. dollars) that You: (a) billed to and shipped to the United States; (b)  
24 billed to an address in the United States, but shipped to a location outside of the United States;  
25 (c) shipped to an address in the United States, but billed to a location outside of the United  
26 States; and (d) shipped and billed to a location outside of the United States.

27 **INTERROGATORY NO. 9:**

28 For each year during the Class Period, state by year how many CRT Products (in both

number of units and revenue in U.S. dollars) that You: (a) billed to and shipped to the United States; (b) billed to an address in the United States, but shipped to a location outside of the United States; (c) shipped to an address in the United States, but billed to a location outside of the United States; and (d) shipped and billed to a location outside of the United States.

**INTERROGATORY NO. 10:**

For each year during the Class Period, state by year how many CRTs (in both number of units and revenue in U.S. dollars) that You shipped to and/or billed to an electronic manufacturing service, original design manufacturer, or system integrator for integration into CRT Products to be sold in the United States.

**INTERROGATORY NO. 11:**

For each year during the Class Period, state by year Your total worldwide dollar amount of sales of CRTs, both in the aggregate and by size of the CRT.

**INTERROGATORY NO. 12:**

For each year during the Class Period, state by year Your total worldwide dollar amount of sales of CRTs, by size and by country of destination.

**INTERROGATORY NO. 13:**

For each year during the Class Period, state by year Your total worldwide dollar amount of sales of CRT Products, both in the aggregate and by the size and type of CRT Product.

**INTERROGATORY NO. 14:**

For each year during the Class Period, state by year Your total dollar amount of sales of CRT Products by the size and type of CRT Products sold and by country of destination

**INTERROGATORY NO. 15:**

For each year during the Class Period, state by year Your dollar amount of sales of CRTs in the United States, both in the aggregate and by size of the CRT.

**INTERROGATORY NO. 16:**

For each year during the Class Period, state by year Your dollar amount of sales of CRT Products in the United States, both in the aggregate and by the size and type of the CRT Product.

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1 **INTERROGATORY NO. 17:**

2 For the sales of CRT Products identified in Interrogatory No. 16, state the value of the CRT  
3 included in the CRT Product sales price.

4 **INTERROGATORY NO. 18:**

5 For each year during the Class Period, state by year Your sales of CRTs to any other  
6 Defendant by size and by country of destination.

7 **INTERROGATORY NO. 19:**

8 For each year during the Class Period, state by year Your sales of CRT Products to any  
9 other Defendant by the size and type of CRT Products sold and by country of destination.

10 **INTERROGATORY NO. 20:**

11 For each year during the Class Period, state in U.S. dollars and by year Your business  
12 profits and losses realized from sales of CRTs by size and by country of destination, and Your  
13 profits and losses for Your business as a whole.

14 **INTERROGATORY NO. 21:**

15 For each year during the Class Period, state in U.S. dollars and by year Your business  
16 profits and losses realized from sales of CRT Products by size and type of CRT Products sold  
17 and by country of destination, and Your profits and losses for Your business as a whole.

18 **INTERROGATORY NO. 22:**

19 To the extent that You contend that prior to November 2007 Plaintiffs knew, should have  
20 known, or were not reasonably diligent in discovery regarding the allegations in their Complaint,  
21 identify all Evidence upon which You intend to rely to prove such contention.

22 **INTERROGATORY NO.23:**

23 To the extent that You contend that You provided false information, or false commitments  
24 relating to pricing or production of CRTs to competitors at Glass Meetings or Bilateral Meetings  
25 with those competitors, identify each instance that you provided false information or a false  
26 commitment and any Evidence related to it.

27 **INTERROGATORY NO. 24**

28 To the extent that you contend that a competitor provided false information or a false

1 commitment relating to pricing or production of CRTs to You at Glass Meetings or Bilateral  
2 Meetings, identify each instance, where such false information or false commitment was  
3 provided to You and any Evidence related to it.

4 **INTERROGATORY NO. 25**

5 If Your response to any of the Indirect Purchaser Plaintiffs' First Set of Requests for  
6 Admission was anything other than an unqualified admission, separately for each Request for  
7 Admission:

8 (a) state the number of the request for admission;

9 (b) state all facts upon which You base Your response;

10 (c) identify all Evidence upon which You intend to rely to support your response;

11 and

12 (d) identify each person who has knowledge of the facts upon which you base your  
13 response.

14 Dated: August 1, 2014

By: /s/ Mario N. Alioto

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**CERTIFICATE OF SERVICE**

I, Vanessa Buffington, declare that I am employed with the law firm of Trump, Alioto, Trump & Prescott LLP, whose address is 2280 Union Street, San Francisco, California 94123. I am over the age of eighteen years and not a party to the within-entitled action. On August 1, 2014, I caused a copy of the following documents to be served:

**INDIRECT-PURCHASER PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANTS**

via electronic mail to the parties below:

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Executed this 1st day of August, 2014, in San Francisco, California.

/s/ Vanessa Buffington  
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